



July 3, 2017

Ms. Marlene H. Dortch, Secretary
Federal Communications Division
445 12th Street SW
Washington, DC 20554

Re: FCC Form 481 – High-Cost Support Information and Low-Income Support Information
Pursuant to 47 C.F.R. §§ 54.313(a-g) and 54.422(a)
Docket No.: WC 14-58

Dear Ms. Dortch:

Pursuant to the Protective Order in *Connect America Fund, et al.*, WC Docket No. 10-90 *et al.* (March 22, 2016) and 47 C.F.R. §§ 0.457 and 0.459, Cordova Telephone Cooperative, Inc. (CTC), by its attorneys, hereby requests that certain materials and information be withheld from public inspection. Specifically, CTC requests confidential treatment of the financial data included in its Form 481 filing.

In support of its request for confidential treatment and pursuant to the requirements under 47 C.F.R. § 0.459(b), CTC states the following:

1. *Identification of the specific information for which confidential treatment is sought.*

CTC seeks confidential treatment of the financial data included in the Form 481 filing accompanying this letter. The Form 481 contains sensitive financial information that would allow competitors undue insight into the strategic intentions of the company.

2. *Identification of the Commission proceeding in which the information was submitted or description of the circumstances giving rise to the submission.*

The documents are being submitted as part of the annual Eligible Telecommunications Carrier ("ETC") Report (Form 481) mandated by 47 C.F.R. § 54.313.

3. *Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.*

The data described is highly confidential and sensitive commercial and financial information which constitutes trade secrets or sensitive commercial and financial information that would "customarily be guarded from competitors"¹ and is therefore exempted from mandatory disclosure under FOIA Exemption 4 and 47 C.F.R. § 0.457(d).²

4. *Explanation of the degree to which the information concerns a service that is subject to competition.*

¹ 47 C.F.R. § 0.457(d)(2).

² 5 U.S.C. § 522(b)(4).



The financial data relates to voice and broadband services provided by CTC that are subject to competition from competitive local exchange carriers, cable television system operators, electric power utilities, fixed and mobile wireless service providers, and/or satellite carriers.

5. *Explanation of how disclosure of the information could result in substantial competitive harm.*

Disclosure of the financial data is likely to result in substantial competitive harm to CTC because it could provide competitors with commercially sensitive insights related to CTC's operations, service offerings, and costs.

6. *Identification of any measures taken by the submitting party to prevent unauthorized disclosure.*

CTC does not make the financial data contained in the Form 481 publically available in any way. This data is only made available to key employees with a direct need-to-know basis. This production has been completed by outside counsel.

7. *Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.*

CTC does not make its granular financial data available to the public and it has not previously allowed disclosure of granular financial data to third parties that are not otherwise bound by confidentiality obligations.

8. *Justification of the period during which the submitting party asserts that the material should be available for public disclosure.*

The financial data should be treated as confidential for a period of five years, as CTC will remain subject to competition and the competitive harms associated with the disclosure of the data while it remains relevant. The financial information will be stale by the time five years has past.

9. *Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted.*

None.

In order to provide adequate protection from public disclosure, CTC requests that the Commission strictly limit distribution of the financial data within the Commission on a "need to know" basis and not allow any distribution outside of the Commission. In the event that any person or entity outside of the Commission requests disclosure of the financial data, CTC requests that it be so notified immediately so that it can oppose such request or take other action to safeguard its interests as it deems necessary and appropriate.

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Please do not hesitate to contact me if you have any questions or I may be of any assistance.

Sincerely,



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